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Religious Societies—Change of Faith by Members.—*Smith v. Pedigo*, 33 N. E. Rep. 777 (Indiana). The members of a Baptist church became divided over a question of theology. The minority faction submitted their claims to the governing body of the Baptist church at large, which adjudged their views to be right according to the faith of their organization. The majority, however, took possession of the church property and forcibly excluded the minority. Action to recover possession. The court held that where property is dedicated to the use of a church having an established faith, it cannot be appropriated by members who have adopted a different faith, that the constitutional provisions for freedom of worship do not give members a right to reject the doctrines of their church and at the same time to enjoy all the privileges of members of such church. The court took into account the decision of the governing body of the church and gave it great weight: not that it was conclusive on civil courts, but that it was a safer guide on such questions than any judgment they might determine on.

Liability of Tenant—Condemnation of Leasehold Estates.—In *Corrigan v. City of Chicago*, 33 N. E. Rep. 746 (Ill.), it was held that the condemnation by a city of the whole of leased premises, determines the tenant's liability for rent, although the condemnation of a part only does not. As his share of the compensation paid by the city, the tenant is entitled to the value of his leasehold estate at the time of the condemnation.

Verdict—Affidavit by Juror to Impeach.—*Flood v. McClure*, 32 Pac. Rep. 254 (Idaho). This was a case of a jury arriving at a verdict in a civil action for damages by agreeing to abide by a "quotient" verdict. The court held that a verdict so reached was a verdict "by a resort to the determination of chance" within the meaning of the Idaho statute, and that it should therefore be set aside. The court held that under the same statute the affidavit of a juror could be admitted to impeach the verdict.